

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
EASTERN DIVISION**

SELENA HOWARD, *et al*

PLAINTIFFS

v.

CAUSE NO. 2:19-cv-00084-KS-MTP

FORREST COUNTY, *et al*

DEFENDANTS

**PLAINTIFF ANTRINET LEGGETT'S RESPONSES TO DEFENDANTS FORREST
COUNTY, MISSISSIPPI; CHEY SUMRALL; AND BLAKE BASS'S FIRST SET OF
INTERROGATORIES**

COMES NOW ANTRINET LEGGETT, hereinafter "Leggett," by and through her undersigned counsel, and hereby responds to Forrest County, Mississippi, Chey Sumrall, and Blake Bass' First Set of Interrogatories Propounded to Antrinet Leggett as follows to wit:

GENERAL OBJECTIONS

1. Plaintiff objects insofar as the Interrogatories seek information or testimony within the scope of the attorney-client privilege or any other applicable privilege or which seek documents or things prepared in anticipation of litigation or trial by or for Plaintiff or his representatives or the mental impressions, conclusions, opinions, or legal theories of Plaintiff's attorneys or other representatives. Pursuant to Rule 26(b)(5), Plaintiff objects to the disclosure or production of documents and materials generated during the course of this litigation that constitute attorney work product or that represent privileged attorney-client communications. These documents and materials include, but are not limited to, correspondence between counsel and the Plaintiff, correspondence between counsel and consulting experts, and counsel's notes concerning the investigation or interviews with potential witnesses.

EXHIBIT G

INTERROGATORY NO. 11: Describe in your own words, in detail, how the events of which you complain took place, beginning three (3) hours prior to the accident, and describing particularly your whereabouts and activities. Please do not simply refer to the Complaint.

RESPONSE: Plaintiff was sleeping 3 hours prior to the incident. When she woke up, she, Ms. Howard, and Darious Leggett left the home to take Ms. Howards sister to her GED class at Pearl River Community College. On the way back home, they passed two sheriff cars and then were followed down their driveway. Ms. Leggett fixed a cup of coffee to go drink on the porch and when she went back outside, two cop cars pulled into the driveway and came up to Ms. Leggett on the front porch. Officer Chey Sumrall made a comment that they “should arrest her for the incident she pulled last month” and then told Selena Howard they had received a text the night before from somebody complaining about their dogs. Darious Leggett went inside the house to show the officers that their dogs are well fed and taken care of and officer Chey Sumrall tried to follow him into the house. Mr. Leggett stated that he knew his rights and Ms. Antrinet stepped in between them to try to stop them from arguing. When Mr. Leggett came back outside with the dog food, Officer Chey Sumrall said it was not enough dog food, and Mr. Leggett explained that the bowl was near empty because they had been feeding their dogs and were going to buy more dog food later that day. Officer Sumrall began acting hostile towards Darious Leggett and threatening to arrest him. Officer Blake Bass then tasered Ms. Antrinet in the hand and then she fell back and hit her head on the lawn mower. Ms. Antrinet saw the officers point their taser at Darious Leggett’s face and then lower

it to his genital area before shooting him with their taser as well. Ms. Antrinet was on the phone with her mother telling her to “call Toby Barker, call Johnny Dupree, call Judge Bill Anderson...” when officer Blake Bass took her phone from her hand. Ms. Antrinet has not seen her phone since Officer Bass took it from her. She was then placed in handcuffs and put in the back of the patrol car. Ms. Antrinet was crying in the back of the car trying to explain that she has blood pressure problems and could not breathe well. She was then taken to the jail where she spent approximately 24 hours.

INTERROGATORY NO. 12: Please state the names, addresses, and telephone numbers of each and every person, corporation, or other entity, including, but not limited to, Medicaid, Medicare, Champus, and insurers which paid any bills or expenses, including, but not limited to, medical bills incurred by you as a result of the events alleged in your Complaint and state the amount paid by each such entity and whether or not any assignment of rights was affected by the payment. If so, please identify all written or oral communications referring to the assignment.

RESPONSE: Plaintiff did not go to the hospital.

INTERROGATORY NO. 13: Please identify each lawsuit, legal proceeding (either civil or criminal), administrative actions (including bankruptcy, worker’s compensation, and/or social security), claims for personal injury or property damage, and/or traffic violations Justin

CERTIFICATE OF SERVICE

I, Daniel M. Waide, attorney for Plaintiff, do hereby certify that I have this day delivered, by electronic means, a true and correct copy of the above and foregoing to the following:

William R. Allen
Jessica S. Malone
Allen, Allen, Breeland & Allen, PLLC
wallen@aabalegal.com
jmalone@aabalegal.com

THIS the 10 day of March, 2020.

By: 
DANIEL M. WAIDE, MSB #103543

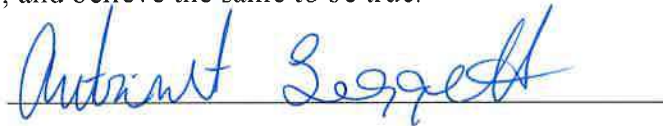
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VERIFICATION OF DISCOVERY RESPONSES

STATE OF MISSISSIPPI

COUNTY OF FORREST

I, ANTRINET LEGGETT being first duly sworn, on oath, depose and say that I am the Plaintiff herein, and that I have read the within and foregoing Plaintiff Antrinet Leggett's Responses to Defendants Forrest County, Missississippi; Chey Sumrall; and Blake Bass's First Set of Interrogatories, know the contents thereof, and believe the same to be true.



ANTRINET LEGGETT, Plaintiff

PERSONALLY came and appeared before me, the undersigned authority in and for the jurisdiction aforesaid, the within named ANTRINET LEGGETT, who after being by me first duly and properly sworn, states on their oath that the matters, things, and allegations set forth in the above and foregoing Plaintiff Antrinet Leggett's Responses to Defendants Forrest County, Missississippi; Chey Sumrall; and Blake Bass's First Set of Interrogatories.

SWORN TO AND SUBSCRIBED by me on this the 6th day of MARCH, 2020.



NOTARY PUBLIC

MY COMMISSION EXPIRES:

